

# Exhibit 25

**Long, Julia (x2878)**

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**From:** Long, Julia (x2878)  
**Sent:** Thursday, July 18, 2024 4:21 PM  
**To:** Matthew Nussbaum; Mangi, Adeel A. (x2563); Sandick, Harry (x2723); LoBiondo, George (x2008); Eppler, Ian (x2205); Chefitz, Jacob (x2474); \_cg J&J-SaveOn; ~jgreenbaum@sillscummis.com; ~klieb@sillscummis.com  
**Cc:** Philippe Selendy; Andrew Dunlap; Meredith Nelson; Elizabeth Snow; Hannah Miles; Wohlforth, E. Evans; Galli, Sabrina M.  
**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)  
**Attachments:** 2024.06.21 Letter from J. Chefitz to M. Nelson re pre-April 2016 documents.pdf; 2024.06.25 Ltr. from E. Shane to E. Snow re Production Deficiencies.pdf; 2024.6.28 Ltr. from B. Robinson to M. Nelson re Production Deficiencies.pdf

Matt,

Thanks again for your email on Friday. We still haven't heard back from you on the enclosed letters—despite SaveOnSP sending JJHCS scores of offensive letters in the same period, including four yesterday alone. We understand that SaveOnSP will respond to our June 21 and June 25 letters this week, and look forward to conferring promptly on any remaining disputes between the parties.

As you know, in our June 28 letter, among other issues, we requested that you add Leslie Kauffman as a custodian based on her central role in SaveOnSP's efforts to evade detection by drug manufacturers. SaveOnSP has produced numerous documents [REDACTED]

[REDACTED] The documents that SaveOnSP has produced, moreover, make apparent that Ms. Kauffman's custodial files contain important and responsive documents that have not been produced to us from other custodians. We provided an example of a document where [REDACTED]

SOSP\_1034492. [REDACTED]

[REDACTED] *Id.* We have not received those emails, presumably because they are not captured by existing custodians.

In an effort to reach agreement on this issue, and subject to agreement on appropriate search terms, JJHCS is prepared to add Joseph Incelli as a custodian, subject to SaveOnSP's agreement to add Leslie Kauffman as a document custodian.

Please let us know if SaveOnSP agrees to this proposal by July 23, 2024. If not, please provide your availability to confer on July 24 or 25, 2024.

Best,  
Julia

**Julia Long**  
She | Her | Hers  
Associate

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas

New York, NY 10036

T 212.336.2878

[jlong@pbwt.com](mailto:jlong@pbwt.com)

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**From:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>

**Sent:** Friday, July 12, 2024 6:45 PM

**To:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Eppler, Ian (x2205) <[ieppler@pbwt.com](mailto:ieppler@pbwt.com)>; Chefitz, Jacob (x2474) <[jchefitz@pbwt.com](mailto:jchefitz@pbwt.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>;

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Wohlforth, E. Evans <[EWohlforth@rc.com](mailto:EWohlforth@rc.com)>; Galli, Sabrina M. <[SGalli@rc.com](mailto:SGalli@rc.com)>

**Subject:** RE: JHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Matt,

Thanks for your email, and we look forward to receiving SaveOnSP's responses to our June 21 and June 25 letters next week. As you know, by then, both will be just shy of a month old. Can you confirm when SaveOnSP will respond to the balance of our correspondence, including the June 28 letter enclosed here?

We also look forward to receiving SaveOnSP's forthcoming production of adherence data, which you represented would be in a "forthcoming production" on April 16. Please let us know if SaveOnSP's intended production date slips further. As to SaveOnSP's forthcoming Teams production, SaveOnSP "anticipated" that the entirety of its Teams production would "take about a month" on June 20, as part of the parties' agreement. You now state that SaveOnSP is "in the process of preparing our first rolling Teams production." When can we expect the balance?

Finally, we anticipate providing a narrowed proposal as to call recordings early next week.

Best,  
Julia

**Julia Long**  
She | Her | Hers  
Associate

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036

T 212.336.2878

[jlong@pbwt.com](mailto:jlong@pbwt.com)

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**From:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>

**Sent:** Friday, July 12, 2024 6:07 PM

**To:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Eppler, Ian (x2205) <[ieppler@pbwt.com](mailto:ieppler@pbwt.com)>; Chefitz, Jacob (x2474) <[jchefitz@pbwt.com](mailto:jchefitz@pbwt.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>;

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>; Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>;

Wohlforth, E. Evans <[EWohlforth@rc.com](mailto:EWohlforth@rc.com)>; Galli, Sabrina M. <[SGalli@rc.com](mailto:SGalli@rc.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Julia,

Thank you for your email. We look forward to your responses to the letters we referenced.

SaveOn intends to produce the relevant adherence data next week and the Johnson and Leger documents by the end of this month. We are in the process of preparing our first rolling Teams production and will update you when we have more information on when we will be able to make that production.

SaveOn intends to respond to both J&J's June 21 letter, which requests an extension of the discovery period, and June 25 letter, about the [Communications@SaveOnSP.com](mailto:Communications@SaveOnSP.com) email box and other topics, next week. As to the remaining letters, SaveOn continues to investigate the issues raised and will respond when we have finished our investigations. Regarding call recordings, you stated that J&J would provide a narrowed proposal this week. See July 3, 2024 Email from I. Eppler to M. Nussbaum. Please let us know when you will provide that proposal.

Thank you,

Matt

**Matthew Nussbaum**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9062 [O]

+1 856.534.8606 [M]

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**From:** Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>

**Sent:** Thursday, July 11, 2024 6:11 PM

**To:** Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>; Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Eppler, Ian (x2205) <[ieppler@pbwt.com](mailto:ieppler@pbwt.com)>; Chefitz, Jacob (x2474) <[jchefitz@pbwt.com](mailto:jchefitz@pbwt.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** RE: JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

Hannah,

Thanks for your email. As you know, we have already acknowledged receipt of four of these letters to let you know we are investigating the issues cited therein. We will respond to those inquiries as promptly as feasible. For the avoidance of doubt, we are also in receipt of your June 28 letter on TrialCard custodians, and anticipate responding to that letter on the same timeframe.

Can you confirm when your team will respond to the attached correspondence? As you will see, most of these pre-date the letters cited in your email. In addition, we'd appreciate if you could confirm when we'll hear back on the adherence data you referenced in an April 16 email; when we can expect your production of documents from Ms. Johnson's and

Ms. Leger's emails; and when you will commence your rolling productions of threaded Teams messages referenced in Meredith's June 21 email.

Best,  
Julia

**Julia Long**  
She | Her | Hers  
Associate

Patterson Belknap Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036

T 212.336.2878

[jlong@pbwt.com](mailto:jlong@pbwt.com)

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**From:** Hannah Miles <[hmiles@selendygay.com](mailto:hmiles@selendygay.com)>

**Sent:** Thursday, July 11, 2024 5:10 PM

**To:** Mangi, Adeel A. (x2563) <[aamangi@pbwt.com](mailto:aamangi@pbwt.com)>; Sandick, Harry (x2723) <[hsandick@pbwt.com](mailto:hsandick@pbwt.com)>; LoBiondo, George (x2008) <[globiondo@pbwt.com](mailto:globiondo@pbwt.com)>; Long, Julia (x2878) <[jlong@pbwt.com](mailto:jlong@pbwt.com)>; Eppler, Ian (x2205) <[ieppler@pbwt.com](mailto:ieppler@pbwt.com)>; Chefitz, Jacob (x2474) <[jchefitz@pbwt.com](mailto:jchefitz@pbwt.com)>; \_cg J&J-SaveOn <[JJSaveOn@pbwt.com](mailto:JJSaveOn@pbwt.com)>; ~jgreenbaum@sillscummis.com <[jgreenbaum@sillscummis.com](mailto:jgreenbaum@sillscummis.com)>; ~klieb@sillscummis.com <[klieb@sillscummis.com](mailto:klieb@sillscummis.com)>

**Cc:** Philippe Selendy <[pselendy@selendygay.com](mailto:pselendy@selendygay.com)>; Andrew Dunlap <[adunlap@selendygay.com](mailto:adunlap@selendygay.com)>; Meredith Nelson <[mnelson@selendygay.com](mailto:mnelson@selendygay.com)>; Elizabeth Snow <[esnow@selendygay.com](mailto:esnow@selendygay.com)>

**Subject:** JJHCS v. SaveOnSP (Case No. 2:22-cv-02632-JKS-CLW)

**External: Think before you click.**

Counsel,

We requested responses to the attached letters regarding (1) J&J's withholding and redacting documents for relevance; (2) TrialCard's CAP custodians; (3) mitigation documents; and (4) Adam Fein search terms, by July 8. We requested a response to the attached letter regarding PAFA+ by July 3.

Please let us know when you intend to respond.

Best,  
Hannah

**Hannah Miles**  
Associate [[Email](#)]  
Selendy Gay PLLC [[Web](#)]  
Pronouns: she, her, hers

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+1 212.390.9055 [O]  
+1 347.731.1404 [M]

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